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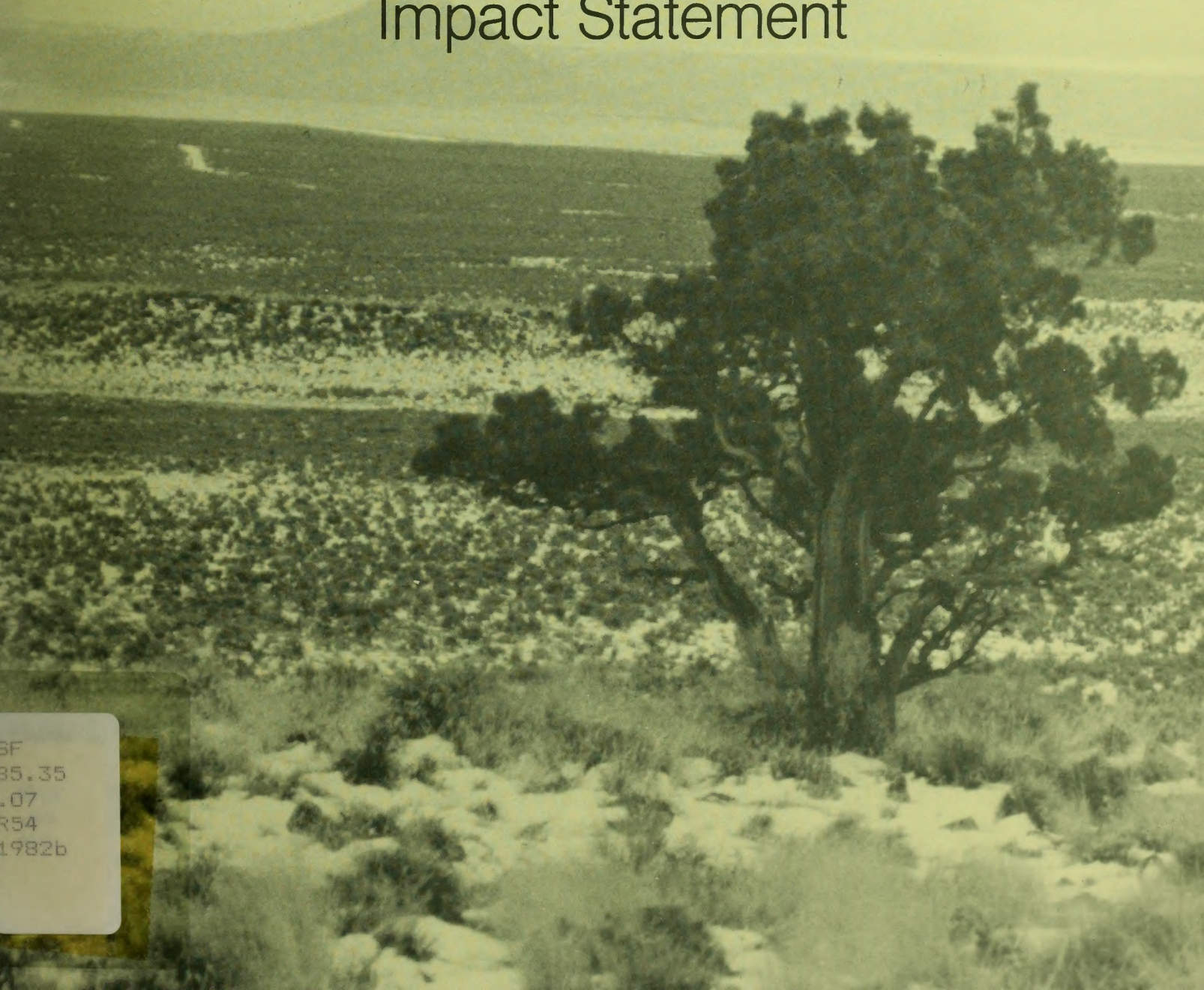
FINAL

Oregon State Office

Sept 1982

Riley Grazing Management

Environmental Impact Statement



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IN REPLY REFER TO



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

OREGON STATE OFFICE
P.O. Box 2965 (825 NE Multnomah Street)
Portland, Oregon 97208

FINAL Environmental Impact Statement

The Riley Grazing Management Final Environmental Impact Statement (EIS) consists only of the comments and responses to the draft EIS, and a listing of necessary text changes. Therefore, this final EIS must be used in conjunction with the earlier draft statement which was distributed to the public in June 1982.

This environmental impact statement is not the decision document. If you wish to comment for the District Manager's consideration in development of the decision, please submit your comments to the District Manager by the end of October 1982. Letters should be addressed to:

District Manager
Bureau of Land Management
74 S. Alvord
Burns, Oregon 97720

The Management Framework Plan decisions on the action to be taken will be based on the analysis contained in the EIS, any additional data available by late 1982, public opinion, management feasibility, policy and legal constraints. The Rangeland Program Summary (which includes the final decision) will be released in early 1983.

Thank you for your interest in this environmental impact statement.

State Director

U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management

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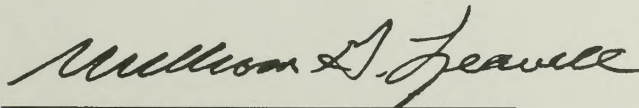
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FINAL

Environmental Impact Statement

Riley Grazing Management Program

Prepared by
Bureau of Land Management
Department of the Interior
1982



State Director, Oregon State Office

RILEY PROPOSED GRAZING MANAGEMENT

Draft () Final (x) Environmental Impact Statement
Department of the Interior, Bureau of Land Management

1. Type of Action: Administrative (x) Legislative ()

2. Abstract: The Bureau of Land Management proposes to implement livestock grazing management on 1,081,140 acres (55 allotments) of public land in central Oregon. Unallotted status would continue on 11,867 acres. Implementation of the proposed action includes allocation of vegetation to livestock, wild horses, wildlife and nonconsumptive uses; establishment of grazing systems; and construction of range improvements. Forage condition would improve and forage production would increase.

Initially, there would be a 27 percent increase in allocation to livestock from the 1980 actual use of 57,975 AUMs. No change in the amount of water runoff would occur, however, sediment yield would decrease. Big game populations are expected to increase slightly. Increased fish production can be expected on Hay Creek and Wickiup Creeks with production remaining the same in all other streams and reservoirs. Waterfowl production would increase moderately. The numbers of upland game birds are not expected to change. Two operators would lose forage exceeding 10 percent of their annual requirements under all alternatives except Alternative 3. Under Alternative 3, losses exceeding 50 percent of current requirements would be experienced by 8 operators for a period of one or more months of the year.

3. Alternatives analyzed:

- a. No Action
- b. Emphasize Livestock Grazing
- c. Emphasize Non-Livestock Grazing Values.

4. The draft statement was filed with EPA and made available to the public early June 1982.

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SUMMARY

This environmental impact statement (EIS) describes and analyzes the environmental impacts of implementing a livestock grazing management program in the Riley EIS area of the Burns District in eastern Oregon. The proposed action, developed through the Bureau planning system using public input, is the preferred alternative. Three other alternatives are also described and analyzed.

The proposed action consists of range improvements, vegetation allocation and implementation of grazing management of 55 allotments covering 1,081,140 acres of public land and continued unallotted status (no authorized livestock grazing) on 11,867 acres.

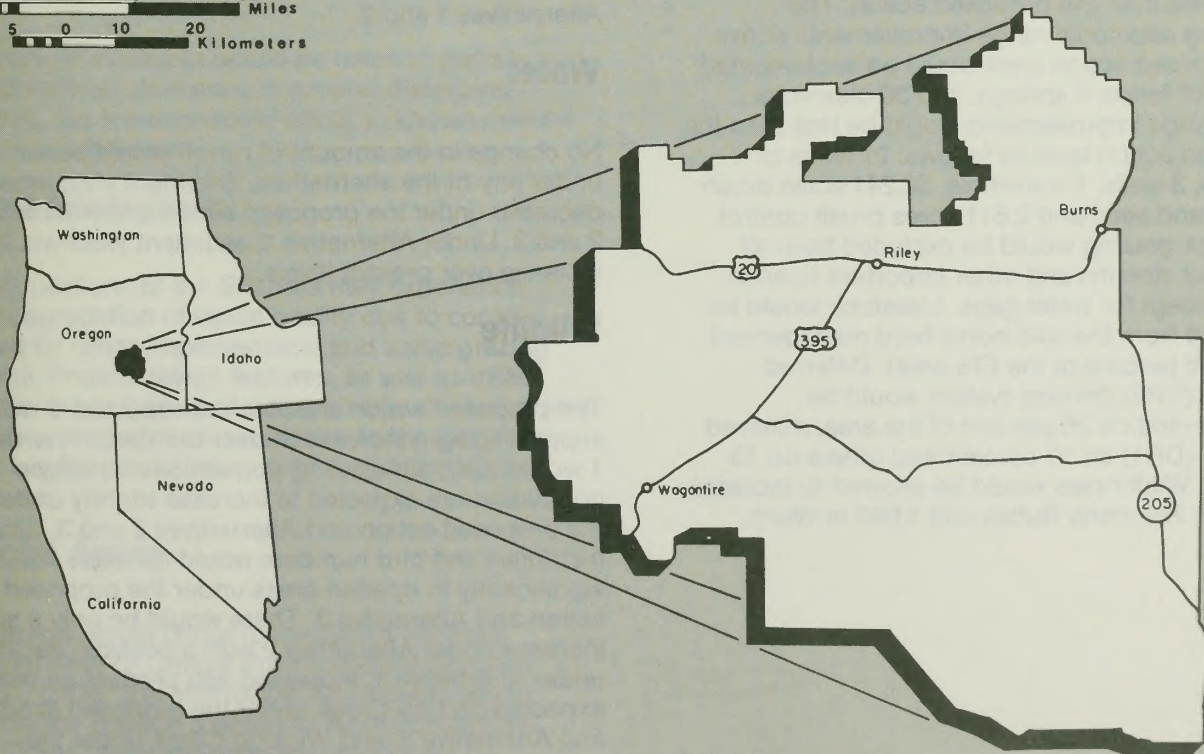
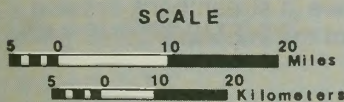
The purpose of the proposed action is to implement planning decisions needed for management, protection and enhancement of the rangeland resources. The proposal would cover a 25-year period; 10 years for implementation and 15 additional years to achieve objectives.

Under the proposed action, the existing forage production of 78,865 AUMs would be allocated to livestock (73,494 AUMs), wildlife (2,340), wild horses (2,364) and nonconsumptive uses (667 AUMs). The allocation to livestock constitutes a 27 percent increase from the 1980 actual use of 57,975 AUMs.

In the long term, implementation of grazing systems and range improvements would result in future forage production that could be as much as 106,061 AUMs. It is anticipated that this would be allocated to livestock (94,485 AUMs), wildlife (2,340 AUMs), wild horses (2,364 AUMs) and nonconsumptive uses (667 AUMs). Rest rotation (RR3) grazing system would be implemented on 45 percent of the area, deferred rotation (DR2) on 28 percent, deferred rotation (DR1) on 16 percent and other on 11 percent.

Proposed range improvements include 176 miles of fence, 8 springs, 62 miles of pipeline, 5 wells, 10 reservoirs, and 10 waterholes. Vegetation manipulation is proposed for 58,314 acres and would consist of 51,703 acres of brush control and seeding, 2,611 acres brush control only and 4,000 acres seeding only. Brush control would consist of spraying with 2,4-D herbicide or burning.

VICINITY MAP RILEY EIS



Three alternatives to the proposed action were analyzed:

1. **No action** - Under this alternative, there would be no change from present management conditions. The existing forage production would be allocated to livestock (73,494 AUMs), wildlife (2,340 AUMs), wild horses (2,364 AUMs), and nonconsumptive uses (667 AUMs). Spring/summer grazing system would continue on 46 percent of the area, rest rotation (RR3) on 19 percent, rest rotation (RR1) on 13 percent and others on 22 percent. No additional range improvement projects or grazing systems would be undertaken.
2. **Emphasize Livestock Grazing** - In the long term, this alternative would provide 6,205 AUMs more than the proposed action from implementation of the following additional improvements: 25,109 acres brush control and seed, 382 acres brush control, 13 waterholes, 33 reservoirs, 56 miles of fence. Deferred rotation (DR1) grazing system would be implemented on 42 percent of the area, deferred rotation (RR2) on 28 percent, rest rotation (RR3) on 18 percent and others on 12 percent. The wild horse numbers would be 30 in the Palomino Buttes herd management area and 60 in the Warm Springs herd management area. All riparian areas would be grazed by livestock except Seiloff Springs area. The initial allocation of forage production would be the same as for the proposed action for wildlife and nonconsumptive uses, 1,284 AUMs less for wild horses and 1,284 more for livestock.
3. **Emphasize Non-livestock Grazing Values** - In the long term, this alternative would provide 9,497 AUMs less than the proposed action. The following additional range improvements above the proposed action level would be implemented: 4 miles of fence, 5 springs, and 30 reservoirs. Other range improvements would be less than the proposed action level as follows: 27 miles of pipeline, 3 wells, 1 waterhole, 32,241 acres brush control and seed and 2,611 acres brush control. Livestock grazing would be excluded from all perennial streams and other important riparian areas except for water gaps. Livestock would be excluded from the wild horse herd management areas (48 percent of the EIS area). Deferred rotation (DR2) grazing system would be implemented on 28 percent of the area, deferred rotation (DR1) on 11 percent and others on 13 percent. Wildhorses would be allowed to increase to 210 in Palomino Buttes and 1,093 in Warm Springs.

ENVIRONMENTAL CONSEQUENCES

Vegetation

Under the proposed action and Alternatives 2 and 3, forage conditions would improve, livestock forage production would increase and total residual ground cover would decrease. Alternative 1 would result in a decline in forage condition, an unquantified decrease in livestock forage production and a decrease in total residual ground cover. The proposed action and Alternative 3 would result in significant increases in woody key species on poor and fair condition riparian areas. Alternatives 1 and 2 would result in decreases in woody species in these areas. The standard procedures and design elements would prevent impacts to proposed threatened, endangered and sensitive plants from construction of range improvements. The impacts from other aspects of the grazing management program on these plant species are unknown.

Soils

Erosion would be slightly decreased under the proposed action and Alternatives 2 and 3 due to the increase in the proportion of residual ground cover composed of perennial vegetation. Erosion would increase on allotments with increases over 1980 use levels under Alternative 1. Streambank erosion would significantly decrease under Alternative 3 and the proposed action. Increases in streambank erosion would occur as a result of the implementation of Alternatives 1 and 2.

Water

No change in the amount of runoff would occur under any of the alternatives. Sediment yield would decrease under the proposed action and Alternatives 2 and 3. Under Alternative 1, sediment yield would increase over present levels.

Wildlife

The proposed action and Alternatives 2 and 3 would support a slight increase in deer numbers. Alternative 1 would maintain existing populations. Antelope population are expected to increase slightly under the proposed action and Alternatives 2 and 3. Small mammals and bird numbers would increase significantly in riparian areas under the proposed action and Alternative 3. There would be only a slight increase under Alternative 2 with a possible decline under Alternative 1. Increased fish production can be expected on Hay Creek under the proposed action and Alternative 3, and Wickiup Creek under the

proposed action and all alternatives. Production would remain the same in all other streams and reservoirs. Water associated bird (waterfowl) production would increase slightly under Alternatives 1 and 2, moderately under the proposed action and greatly under Alternative 3. There would be no change in upland game bird populations under the proposed action and Alternative 1 with a slight decrease under Alternative 2 and a slight increase under Alternative 3.

Wild Horses

Temporary disturbances to wild horses would occur during the period of construction of range improvements under the proposed action and Alternative 2. Wild horses would be allocated sufficient forage to provide for a maximum total population of 1,303 head under Alternative 3; 260 head under the proposed action and Alternative 1; and 90 head under Alternative 2.

Recreation

Projected visitor use to 1990 would not be significantly impacted under any alternative. As a result of impacts to recreational experiences and recreation-related wildlife populations, visitor use reductions would tend to balance increases in visitor use in activities beneficially impacted. Under all alternatives, area-wide 1990 projected visitor use for public lands in the EIS area would show an estimated 24 percent increase over existing levels for a total of about 148,000 visitor days.

Cultural Resources

Appropriate measures would be taken to identify and protect cultural sites prior to ground-disturbing activities. No impacts would occur to known cultural sites of significance.

Visual Resources

Certain portions of the EIS area may experience slight degradation of visual quality due to contrast created by range improvements and some grazing systems. Project design features, as well as VRM program procedures and constraints, would minimize land form and vegetative contrast. In the long term, visual quality would improve as range condition improves.

Special Areas

No impacts would occur to the South Narrows potential Area of Critical Environmental Concern (ACEC) under any alternative. No impacts would occur to the Section 8 potential Research Natural Area (RNA) under the proposed action or Alternatives 1 and 3. Under Alternative 2, the area

would be open to livestock grazing resulting in vegetative disturbance, soil compaction and erosion.

Socioeconomics

Two operators would lose public forage exceeding 10 percent of their total annual forage requirements in the short term under the proposed action and Alternatives 1 and 2. Under Alternative 3, 12 operators would lose more than 10 percent of their annual requirements. In terms of their month-to-month requirements, under Alternative 3 eight operators would lose 50 percent or more of their requirements for one or more months during the year.

Local personal income and employment in the short term would be increased under all alternatives, however, increases under Alternative 3 would be negligible. In the long term under the proposed action, income would be increased by \$805,000 annually and employment by 78 jobs. Increases would also occur under the other alternatives.

CONSULTATION AND COORDINATION ON THE DRAFT
ENVIRONMENTAL IMPACT STATEMENT

The Draft Riley Grazing Management Environmental Impact Statement (Interior DEIS 82-20) was filed with the Environmental Protection Agency and released to the public in June 1982 and open to comment until August 3, 1982. An informal meeting was held in Burns, Oregon, July 14, 1982, to answer questions on the draft EIS.

Comments that presented new data, questioned facts or the adequacy of the impact analysis, or raised questions or issues bearing directly on the draft EIS were responded to in this final EIS. Several reviewers made various resource management recommendations. These recommendations, as well as all public input, will be considered before the final decision is made.

The letters which were received have been reproduced in this final, with each substantive comment identified and numbered. BLM responses immediately follow each of the letters.

Response to Comments

All comment letters received were assigned an index number.

<u>Letter Number</u>	<u>Agency, Organization or Individual</u>
1.	USDI, Bureau of Reclamation
2.	Mazamas
3.	USDA, Forest Service, Pacific Northwest Region
4.	Barrett, Hanna, Daly & Gaspar, Attorneys for American Horse Protective Association, Inc.
5.	Environmental Protection Agency, Region X
6.	Wildlife Management Institute
7.	Oregon, Intergovernmental Relations (A-95 Clearinghouse). Agriculture Fish and Wildlife State Historic Preservation Officer
8.	Cowan, Richard J.
9.	Wild Horse Organized Assistance
10.	USDI, Fish and Wildlife Service, Division of Ecological Services
11.	USDI, National Park Service
12.	George McGee



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
PACIFIC NORTHWEST REGION
FEDERAL BUILDING & U.S. COURTHOUSE
BOX 048-550 WEST FORK STREET
BOISE, IDAHO 83724

IN REPLY
REFER TO PN 150
772.

JUN 28 1982

Memorandum

To: State Director, Bureau of Land Management, 729 NE. Oregon Street,
P.O. Box 2965, Portland, Oregon 97208

From: Regional Director, Boise, Idaho

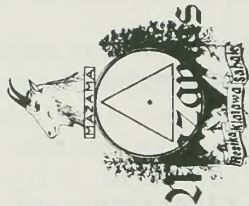
Subject: BLM's Riley Grazing Management Environmental Impact Statement,
Oregon (DES 82-20)

The subject statement has been reviewed by appropriate members of our staff,
and we have no objections to the content of the document. Please let us
know if we can be of further assistance in the review process.

For the Regional Director,

Douglas J. James

Regional Environmental Officer



Oregon State Director (535)
BLM
P.O. Box 2965
Portland, OR 97208

Conservation Committee
July 13, 1982

Subject: Riley Grazing Management

Dear Sir:

We appreciate the opportunity to comment on this draft EIS and also appreciate the concise manner that the summary of proposed land use alternatives are presented and the background information included in this draft.

Alternate 3 has our basic support as it provides for maximum diversity, a range of uses, and the most protection to the basic resource, the land. Our major change to this alternative has to do with the wild horses. Since the horse is not native to this area, and when present in numbers is destructive to the land, we support a reduction to the minimum level necessary to maintain a remnant population as listed under Alternative 2. We fully support protection of the riparian zones from cattle grazing as many of the small streams in the area are preyed upon by too much cattle trampling. If possible, the fences to keep out the cattle should not keep out the deer and antelope. The proposed action would get our support by maximizing the riparian protection from cattle and a reduction in the wild horse numbers.

Since this is primarily a grazing plan, we feel based on many observations in Eastern Oregon that grazing probably needs to be reduced at least in part of this management area. We are pleased to see that you are considering other grazing systems that allow more rest rotation and adding deferred rotation which incorporates some of the Swiss mountain grazing system where the cows are held out of the high pasture until the grasses and other forbs have had a chance to mature. The growing plants and cows are kept apart in contrast to the current practice in this and much of the West, of turning the cows out on the range early in the season so they are eating the forage just as it gets growing. The only plants that survive under this grazing practice are the ones such as sage that the cows do not like. Delayed grazing would expect to result in more total weight of forage and probably more nutritious forage because it would contain developing seeds, etc.

Nine-O-Nine Northwest Nineteenth Avenue - Portland, Oregon 97209 - Telephone (503) 227-2345

BLMANS were organized on the summit of Mt. Hood in 1984. The purposes of the club are to explore mountains, to document authentic and scientific information concerning them, and to encourage the preservation of forests and other features of mountain scenery in their natural beauty. Anyone who has climbed to the summit of a mountain on which there is a living glacier is eligible for membership. The word "BLMANS" is derived from the name of a mountain goat.

In closing we want to again state that the land which is the basic resource needs maximum protection so it will remain for future generations use.

Yours truly,
Bob Powne

Bob Powne
Chairman - Conservation
Committee

BP/pk



United States
Department of
Agriculture

Forest
Service

Pacific
Northwest
Region

319 S.W. Pine
P.O. Box 3623
Portland, OR 97208

Revised 1950

Date July 13, 1982

Ferry Fullerton, EIS Team Leader
Bureau of Land Management (935)
Oregon State Office
P.O. Box 2965
Portland, OR 97208

Dear Mr. Fullerton:

Thank you for the opportunity to review the Draft Environmental Impact Statement for the Riley Proposed Grazing Management Program.

We have no substantive comments to offer in our area of expertise or jurisdiction.

Sincerely,

Jeff M. Sirmom
JEFF M. SIRMOM
Regional Forester



4

LAW OFFICES
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July 16, 1982

4.2

The result is a highly artificial study, at least insofar as impacts on the horses are concerned. The appropriateness of the forage allocation made for wild horses is never discussed in the EIS; the horses are not considered and analyzed as a component of the rangeland management program. This approach cannot possibly satisfy the requirements of the Wild Horse Act or the National Environmental Policy Act.

The proposed action illustrates how wild horses and other natural interests have been sacrificed to protect livestock interests. The initial forage allocation to livestock is 73,494 AUMs -- 93 percent of the total available forage and 27 percent more than was actually used in 1980. Wild horses are allocated only 2,364 AUMs, and wildlife only 2,340 AUMs, each getting approximately three percent of the available forage. Long-term range improvements are expected to increase forage production by nearly 21,000 AUMs, all of which has been allocated to cattle for the purposes of analysis in the Draft EIS.

As a result of this proposal, wild horse numbers will be reduced from 532 (the 1980 population) to between 130-260 (sufficient forage is reserved for an average herd of 197 horses). As noted above, however, this allocation does not represent a reasoned attempt to determine how many horses the range can support in balance with other grazing uses.

*/ The proposed action in the Draft EIS differs from that described in the April 15, 1982, "Riley Land Use Plan Proposed Actions," which allocated 3,100 AUMs to wild horses. The Draft EIS has taken over 700 AUMs from that initial allocation, and transferred them to wildlife and non-consumptive uses.

4.3

I am writing on behalf of the American Horse Protection Association, Inc., to comment on the Riley Grazing Management Draft EIS.

In its comments on the proposed land use alternatives for the Riley EIS area, AHPA made two suggestions: (1) consider an alternative somewhere in between the extremes of "maximize livestock use" and "maximize wild horse use"; and (2) provide that wild horses share in the increased forage available as a result of the new grazing management programs. Unfortunately, but not surprisingly, the Draft EIS incorporated neither suggestion. The Draft continues BIM's practice of establishing a very low wild horse population prior to the EIS process, and using that population as a premise upon which the EIS is developed. The EIS then analyzes and "either/or" set of alternatives that implies that middle-ground alternatives are unreasonable or unworkable.

4.4

4-1

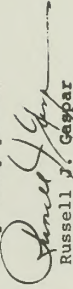
William G. Leavall
July 16, 1982
Page Three

4.5 It is an arbitrarily allocation made pursuant to the existing wild horse herd management plans, which were developed outside the EIS process.

4.6 The two alternatives considered to the proposed action would reduce wild horse numbers to only 45-90 (alternative 2) or allow them to increase to 651-1303 (alternative 3). These alternatives provide some analysis of the costs and benefits of emphasizing one rangeland value to the virtual exclusion of another, but are not particularly helpful to determine how wild horses should be protected as components of a natural ecological balance. However, the data in the Draft EIS suggests that a higher allocation of forage to wild horses could have positive benefits: more residual ground cover and better streamside riparian vegetation, without necessarily sacrificing the long-term forage production increases or the improvements in range condition that are expected to result from implementation of the proposed action.

4.7 The Draft EIS could have, and should have, analyzed an alternative allocating wild horses additional forage -- for example, enough to support an initial herd approximately the size of the current population, which would be allowed to grow in relation to the availability of additional forage. The costs and benefits of the alternative would be known, and the intent of the Wild Horse Act and NEPA would be fulfilled. I urge you, therefore, to re-draft the Riley EIS and circulate such an alternative for public review and comment.

Very truly yours,


Russell J. Caspar

Attorney for American Horse Protection Association, Inc.

cc: J. R. Blue
RJG:bb

Response to Comment Letter 4

4-1 Comments on the Summary of Proposed Land Use Alternatives, other than that of American Horse Protection Association, did not support an alternative for horse levels between those in Alternatives 2 and 3 other than the proposed action level. Comments also were against an increase in future horse numbers. The alternatives as defined in the EIS were thus felt to best reflect public opinion. The alternatives are not an either-or proposition. As stated on page 1-13 in the draft EIS, the decision may be to select one of the EIS alternatives (including the proposed action) intact, or to blend features from several alternatives that fall within the range of actions analyzed in the EIS. In the case of horse numbers, the decision could be allocation of vegetation for any number of horses between 90 and 1,303.

4-2 All anticipated forage increases were shown as allocated to livestock for analysis purposes only. No decision on the actual allocation of increased forage will be made until the forage is produced. The proposed initial allocations provide sufficient forage to maintain a population of horses which is consistent with the objectives in the existing herd management plans. If those objectives were to be changed in the future to increase horse numbers, forage would be allocated to support the additional horses.

4-3 The proposed action forage allocation provides for the wild horse numbers based on the objectives in the existing herd management plans. The purpose of the EIS is not to justify the proposed action or alternatives; therefore, the appropriateness of the allocations is not discussed. Impacts on horses from the components (forage allocation, grazing systems and range improvements) of the proposed action and alternatives were analyzed in the draft EIS.

4-4 The proposed allocations are an attempt to balance and accommodate competing grazing uses. For example, the land in the Palomino Buttes Herd Management Area is also used as deer winter range, antelope year-long range, and for livestock grazing. The proposed action allocates sufficient forage to satisfy the population objectives of the herd management plan. The 1980 population levels substantially exceed the herd management plan objectives, but 1982 herd populations are within the range called for in the herd management plan and provided for in the proposed action forage allocation.

4-5 The "Riley Land Use Plan Proposed Actions" brochure identified approximately 3,100 ADM's forage consumption by horses, of which 2,364 ADMs are competitive with livestock. Approximately 756 ADMs of noncompetitive forage consumption would occur. The sum consumption of competitive and noncompetitive forage equals 3,120 ADMs. Only competitive forage allocations are shown in Table 1-1 in the draft EIS.

4-6 The proposed allocations are part of the proposed Management Framework Plan (MFP), which was developed using public input. Also see response to comment 4-3.

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X

1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101



5

4-6 The predicted increases in residual ground cover and riparian woody vegetation are due to exclusion of livestock, not higher allocation of forage to horses.

4-7 See response to comment 4-1.

REPLY TO
ATTN OF: M/S 443

William G. Leavell
Oregon State Director (935)
Bureau of Land Management
PD Box 2965
Portland, OR 97208

RE: Riley Grazing Management EIS

Dear Mr. Leavell:

The Environmental Protection Agency (EPA) has completed review of the Draft EIS for the Riley Grazing Management Plan. Review of the DEIS is based on likely effects of alternative range management proposals and grazing plans in the context of EPA's specific program authorities and responsibilities. In this case, we have given particular emphasis to water quality effects.

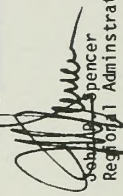
In general, the DEIS is quite thorough in its presentation of the proposed and alternative actions. Analysis of consequences for selecting and implementing different actions is clear. EPA supports design and implementation of grazing management plans which maintain water quality and lead to declining sedimentation rates in parallel with implementation of range improvements.

In the cover letter, you recognize that budget limitations may affect plan implementation. This point should be discussed in more detail, indicating possible contingencies to minimize the environmental effects of funding limitations and elements of the final action chosen which may be delayed or eliminated by limited funds.

5-1

EPA has rated this EIS LO-1 [LD -- Lack of Objection; 1 -- Sufficient Information]. We appreciate the opportunity to review this report.

Sincerely,


Richard Spencer
Regional Administrator

Wildlife Management Institute

709 Wire Building, 1000 Vermont Ave., N.W., Washington, D.C. 20005 • 202 / 347-1774



DANIEL A. POOLE
President
L. B. AHN
Vice President
L. L. WILLIAMSON
Secretary
JACK S. PARKER
Board Chairman

July 16, 1982

Oregon State Director (935)
Bureau of Land Management
Post Office Box 2965
Portland, Oregon 97208

Dear Sir:

The Wildlife Management Institute is pleased to comment on RILEY GRAZING MANAGEMENT, ENVIRONMENTAL IMPACT STATEMENT, Oregon.

We have carefully reviewed the plan and have many serious concerns, both for wildlife and as a public policy.

The second paragraph in the transmittal letter indicates our major concern, saying that a cost-benefit analysis has not yet been made.

6-1 The plan is a livestock enhancement plan--with some riparian improvement thrown in for wildlife. There is an immediate increase in grazing AUM's of 27 percent above the five-year actual use. There are no increased AUM's going to wildlife. Unless some of this is allocated it will be difficult, if not impossible, to get increases twenty years from now.

The riparian improvement will benefit wildlife and is good, but firmer details are needed. Again, the second paragraph in the covering letter gives us serious concern that this wildlife-benefiting procedure will not be undertaken.

6-2 Examination of the maps shows existing and planned range treatment areas are concentrated. Guidelines and direction on proximity of seedings and overall diversity are needed. A better cover mix can be obtained on the high desert by using controlled burning rather than spraying.

Our principal objections to the plan are economic. The following figures illustrate:

Increase in Livestock AUM's	20,894
Cost of Range Improvements	\$2,367,000
Cost of Improvements per AUM	\$113.29
Number of Operators	52
Average Increase per Operator (AUM)	401.8
Average Subsidy per Operator	\$45,520
Number of Jobs	78
(1 per 268 AUM)	

Response to Comment Letter 5

5-1 Although the number and the type of range improvements may be limited by range investment (benefit/cost) analyses and budget considerations, any improvements constructed would include the mitigation described in the Standard Procedures and Design Elements section of the draft EIS. The design elements apply to any range improvement initiated regardless of levels of funding for the total program. Reducing the number of range improvements would result in a smaller long term increase in livestock forage production and may require the adoption of a different combination of proposed grazing systems than described in the draft EIS. Adjustments (primarily increases) to the proposed livestock allocation would be delayed if funding for resource monitoring was unavailable. No increases would occur until evaluations indicate the additional forage is available. Alternative 1, No Action, analyzes the affects of no new range improvements.

6-3

The number of jobs created seems excessively high, based on recent EIS examined from other states.
 It is unlikely that any significant part of the \$45,520 subsidy per operator will be returned to the United States based on present grazing fees and interest rates.
 The wildlife benefits accruing could be realized cheaply with some grazing reductions and riparian zone fencing, and with the range improvements recognized for what they are--a loose subsidy to 52 ranchers.
 At the same time this subsidy is proposed, the following reductions in BLM's wildlife budget for the whole state of Oregon are in effect or planned:

1981	Base Year
1982	Minus 13.1 percent (from base)
1983	(Estimated) Minus 26.1 percent (from base)
1984	(Estimated) Minus 43 percent (from base)

The commodity users continue to get more--the public resources continue to get less. We object to this plan and the policies that produced it.

Some specific comments follow:

6-4

Table 1-2 Show miles of stream fenced.

6-5

Page 1-1 Riparian acres should agree with fencing.

6-6

Figure 1-2 Existing seedlings should be on the map.

6-7

Page 1-13 We object to creating a new decision from portions of several alternatives. The decision should be close to the preferred alternative in the final EIS.

6-8

Page 1-14 All riparian areas should be monitored.

6-9

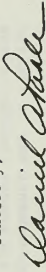
Page 2-7 Wildlife populations are 10-15 percent below goals of the Oregon Department of Fish and Wildlife, yet no increased forage allocation is made (Table 1-1 and Table 1-6).

6-10

Page 3-1 A firm statement is needed that conflict resolution on big game winter ranges will be resolved in favor of wildlife. We disagree that the principal resource affected is vegetation. Co-equal is the wildlife dependent on that vegetation.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,



Daniel A. Poole
 President

DAP:lbb

Response to Comment Letter 6

6-1 The proposed initial livestock allocation is the same as the 1980 active preference (see Glossary in the draft EIS) although it is higher than the 1980 actual use. The difference represents normal fluctuations in the permittees' operations due to individual circumstances (sales, change in herd size, illness, etc.). Five year average actual use was not used as a basis for analysis.

6-2 Guidelines for minimum spacing between treatment areas and quantified standards for overall diversity have not been developed by BLM. However, the Bureau's Oregon and Washington Range Seeding Program Guidance states that "... each seeding will be analyzed to determine its cumulative impact on the ecosystem as well as the site specific impact." The guidance also states that "plant species diversity ... will be formally addressed in the project layout and design, and that "seedings should be designed to increase the overall diversity of vegetation in the planning area."

6-3 The job estimate in the Riley EIS represents direct, indirect and induced employment based upon BLM's application of the US Forest Service IMPLAN system. Some studies do not include the employment induced by expenditures of the household sector. The results, however, are consistent among alternatives and provide a suitable basis for comparison.

6-4 Table 3-5 in the draft EIS quantifies miles to be excluded from livestock grazing by fencing at specific stream segments.

Stream miles from Table 3-5 are summarized below:

	Existing		Proposed Action		Alt.		Alt. 3
	1	2	1	2	2	3	
Exclusion	1.0		5.0	0	0	0	30.0
Temporary Exclusion	1.45		3.3	1.45	1.45	1.45	0
Total miles	2.45		8.3	2.45	1.45	1.45	30.0

6-5 Livestock would be temporarily excluded along three stream riparian areas (which include 103 riparian acres and 613 upland acres for a total of 716 acres).

6-6 Existing seedings are shown on Figure 2-1 in the draft EIS.

6-7 Under the National Environmental Policy Act (NEPA), the decision may fall within the range of alternatives analyzed in the EIS.



Executive Department

155 COTTAGE STREET N.E., SALEM, OREGON 97310

July 21, 1982

Oregon State Director (935)
 Bureau of Land Management
 P.O. Box 2965
 Portland, OR 97208

Subject: Riley Grazing Management Draft EIS
 PNRS # OR820607-021-5

Thank you for submitting your draft Environmental Impact Statement for State of Oregon review and comment.

Your draft was referred to the appropriate state agencies. The Departments of Agriculture and Fish and Wildlife, and the State Historic Preservation Office offered the enclosed comments which should be addressed in preparation of your final Environmental Impact Statement.

We will expect to receive copies of the final statement as required by Council of Environmental Quality Guidelines.

Sincerely,

INTERGOVERNMENTAL RELATIONS DIVISION

Kay F. Wilcox
 Kay F. Wilcox
 A-95 Coordinator

KW:mh
 Enclosures

- 6-8 Monitoring would be conducted in all riparian areas for which resource objectives have been identified.
- 6-9 Forage was allocated to accommodate management objective numbers provided by Oregon Department of Fish and Wildlife. See Appendix C of the draft EIS.
- 6-10 The text has been changed to clarify this statement. See text changes for page 3-1.



OREGON PROJECT NOTIFICATION AND REVIEW SYSTEM

STATE CLEARINGHOUSE

JUL 0 1982 Intergovernmental Relations Division
155 Cottage St NE Salem, Oregon
Phone: 378-3732 97310

P U B L I C S T A T E R F V I F W

Project #: **OR 820607-021-5** Return Date: **JUL 2 1982**

To Agency Addressed: If you intend to comment but cannot respond by the return date, please notify us immediately. If no response is received by the due date, it will be assumed that you have no comment and the file will be closed.

PROGRAM REVIEW AND COMMENT

TO STATE CLEARINGHOUSE: We have reviewed the subject Notice and have reached the following conclusions on its relationship to our plans and programs:

- () It has no adverse effect.
- () We have no comment.
- () Effects, although measurable, would be acceptable.
- () It has adverse effects. (Explain in Remarks Section)
- () We are interested but require more information to evaluate the proposal. (Explain in Remarks Section)
- () Additional comments for project improvement. (Attach if necessary)

REMARKS (Please type or print legibly)

Remarks attached.

RILEY GRAZING MANAGEMENT E.I.S. STATEMENT

Oregon Department of Agriculture

In reviewing the Riley Grazing Management Environmental Impact Statement, Draft May 1982, the Oregon Department of Agriculture notes that upgrading of rangeland is necessary in order to reduce less desirable vegetation.

As with all public land projects the highest and best use, considering social, economical, political and institutional aspects must be obtained. We believe the proposed action, or combination thereof with alternative two, will accomplish the highest and best use.

We note major differences between the proposed action and alternative two in AIM's allocated for wild horses, numbers of reservoirs and water holes, fenced miles and acreage requiring brush control and seeding, in order to emphasize livestock production. Economically, both alternatives will theoretically increase employment opportunities, and create returns above cash costs. Our final concern is that wild horses are maintained at or below the levels set out in the project plan, not only because of desirability to livestock producers for the dual use of the range, but also from a health standpoint relating to contact with domestic animals. Lower numbers may help reduce health hazards for which horses may be carriers.

We conclude that any action, whether it be the proposed or alternative two, or a combination, should provide the highest combination of private and public returns above costs.

Agency Agriculture

By Matthew S. Johnson
Phone Number 378-4445



OREGON PROJECT NOTIFICATION AND REVIEW SYSTEM

STATE CLEARINGHOUSE

Intergovernmental Relations Division
155 Cottage St NE Salem, Oregon
Phone: 378-3732 97310

P N P S S T A T E R F V I E W

Project #: OR 820607-021-5 Return Date: July 9 1982

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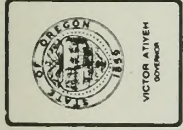
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- (X) Additional comments for project improvement. (Attach if necessary)

REMARKS (Please type or print legibly)

7.1



Department of Fish and Wildlife
506 S.W. MILL STREET, P.O. BOX 3503, PORTLAND, OREGON 97208

July 8, 1982

William G. Leavell
Oregon State Director
Bureau of Land Management
P.O. Box 2965
Portland, OR 97208

Dear Bill:

The Oregon Department of Fish and Wildlife has reviewed the Riley Grazing Management Draft Environmental Impact Statement. Our response is in two parts: general concerns, followed by specific comments and recommendations.

General

Protection of sage grouse nesting areas is a major concern of the Department in this area.

We strongly support the use of irregular patterns in vegetative manipulation projects and look forward to participating in their layout and design.

Specific

Sage Grouse Nesting Areas

Page 1-5, paragraph 1 states that "up to 50 percent of sagebrush could be removed within any sage grouse wintering ground or within two miles of any strutting area."

We do not support that statement. Removal of sagebrush in wintering grounds can be detrimental to sage grouse during periods of heavy snowfall. We recommend no treatment be attempted within these identified sage grouse strutting and nesting areas that will threaten or degrade sage grouse habitat.

Limited livestock grazing can be beneficial to sage grouse nesting areas, however, we recommend that any grazing plans for these areas be closely coordinated with local Department staff.

Agency Fish and Wildlife By Long Feely Phone Number 229-47-9

William G. Leavell
July 8, 1982
Page -3-

Big Game Species

Pages 3-17, conclusions, assume the proposed action would increase deer numbers 5 to 20 percent and antelope populations 10 to 20 percent. Much of the BLM's range improvements would revolve around the creation of numerous crested wheat grass seedings in areas practically devoid of deer. This improvement alone will add very little to total deer numbers. However, use of the proposed seedings by cattle, in conjunction with changed grazing systems on existing range allotments that support large winter deer populations, could help achieve the desired deer population increases. The proposed seedings could lead to increased antelope numbers by breaking up some of the large expanses of big sage brush and developing additional water. However, it would take many years before we would see a 10 to 20 percent increase in the antelope population as a result of the range modification.

Wild Horses and Burros

Table 3-16, lists the maximum herds at 60 and 200 animals for Palomino Buttes and Harms Springs, respectively. We would prefer that these herds be maintained at a lower level. However, should the above herd sizes be adopted, we recommend that every effort be made to ensure that the numbers of horses and burros do not exceed these levels at any time.

We appreciate the opportunity to review and comment on this Riley Grazing Management Environmental Statement. We are looking forward to close and continuing involvement between your office and our field staff in preparing the final EIS and in the implementation of the management program.

Sincerely,

John R. Donaldson
John R. Donaldson, PhD
Director

JRD:kes

William G. Leavell
July 6, 1982
Page -2-

Grazing Systems

Page 3-15; 1st paragraph stated "Rest rotation grazing would greatly increase bitterbrush production for use by deer."

If we refer back to the discussion of the rest rotation grazing system on pages 3-4, it states that "only the three pasture system would result in significant increases in key species (both herbaceous and woody). The other two systems, while enhancing key species vigor would maintain the species composition at current levels."

There is not much bitterbrush range but what is there is important. From statements on pages 3-4 and 3-15, it appears that only the three pasture rest rotation system would be of benefit to a bitterbrush range because it supposedly would foster increases in the number of desired plants. Increasing forage vigor is important but we will eventually need seedling establishment to maintain the desired browse composition.

Vegetative Manipulation

We prefer the use of controlled burning over the use of chemicals in these projects.

Antelope and other wildlife in the Riley Resource Area, specifically northeast of Foster Flat, could be benefitted by a series of prescribed burns in large contiguous blocks of Wyoming big sagebrush (*Artemisia tridentata wyomingensis*). To maximize the benefit, fires should burn over hilltops and the upper third of the hillsides with small, irregular fingers extending various lengths down toward the draw bottoms. Fire intensity should be sufficiently hot to remove the majority of the sagebrush plants, but fire design should enable leaving islands of big sagebrush randomly scattered through the burn area. Burning should be done at a time that would cause the least damage to forbs and grasses (i.e., early spring or late summer).

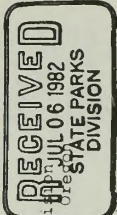
Burning of this nature in big sagebrush monocultures would directly benefit antelope by increasing visibility, making more soil moisture and nutrients available to grasses and forbs, and increasing forb and grass production. Other wildlife species should be enhanced by the increased edge and habitat juxtaposition created by the irregular shape of the burns. The same general statement could be applied to much of the country north and west of Foster Flat and east of U.S. 395. However, much of that area would need water development along with the vegetation manipulation.



OREGON PROJECT NOTIFICATION AND REVIEW SYSTEM

STATE CLEARINGHOUSE

Intergovernmental Relations Division
155 Cottage Street
Salem, Oregon 97310
Phone: 378-3732



Response to Comment Letter 7

7-1 Removal of sagebrush in wintering grounds can be detrimental to sage grouse. The referenced statement describes the guidelines for vegetation manipulation in sage grouse habitat under the proposed action only. The guidelines for Alternatives 2 and 3 are described on Page 1-5 and 1-6 respectively of the draft EIS. See the draft EIS impact analysis (page 3-16) which states that sagebrush control would affect 2 of 35 known strutting grounds.

7-2 Although bitterbrush composition and production may not increase with some rest rotation systems, the availability of bitterbrush for deer would increase. In the rested pasture, all of the current year's growth would be available to deer. See the text revision for page 3-15 of the draft EIS. Over the long term, bitterbrush composition would not change for two pasture rest rotation.

JUL 2 1982

P M P S STATE R F V I F M

Project #: OR 820607-021-5

Return Date: JUL 2 1982

To Agency Addressed: If you intend to comment but cannot respond by the return date, please notify us immediately. If no response is received by the due date, it will be assumed that you have no comment and the file will be closed.

PROGRAM REVIEW AND COMMENT

TO STATE CLEARINGHOUSE: We have reviewed the subject Notice and have reached the following conclusions on its relationship to our plans and programs:

- () It has no adverse effect.
- () We have no comment.
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- () We are interested but require more information to evaluate the proposal. (Explain in Remarks Section)
- () Additional comments for project improvement. (Attach if necessary)

REMARKS (Please type or print legibly)

B.M.
Draft Rely EIS

Although direct impacts to cultural resources can be avoided by CIRM compliance, indirect impacts of increased range use by animals cannot.

Agency SAHO

FOR FURTHER INFORMATION
PLEASE CONTACT LELAND
By _____
Phone Number 703-5023

Richard J. Cowan

Suntex Ranch
Riley, Oregon 97758

July 17, 1982

Mr. Chad Bacon
Riley Area Manager
BLM
Burns, OR 97720

Dear Chad:

The following are my comments and suggestions concerning the Riley EIS.

I prefer Alternative #2, with emphasis on livestock, to the proposed action in the draft. This is not because I am a livestock operator, but because the area is suited for livestock more than for any other use. In the long run, more cattle in the area would be economically beneficial to the general economy of the area as well as to the operators involved. The reduction in horse numbers would still leave a substantial number of horses in the area, while releasing more of the resource for a beneficial use.

In my particular area of concern, the Sheep Lake-Shields allotment, I have two suggestions and additions. This is a very rocky area, and I would like to see the inclusion in the EIS of bulldozing livestock trails through the allotment. Where there is a trail, cattle will go further and utilize more remote areas of feed than when they must push their way through the rocks.

In the lower end of the Sheep Lake allotment is an area with a good understory of perennial grasses, in which the sagebrush could be sprayed. I think this area could be added to the list of potential brush control sites. There are several hundred acres in this site.

Finally, I think the document should include a statement to the effect that the failure to mention any item, practice, or subject in the EIS does not preclude them being considered at a later date.

I hope these comments will merit your consideration.

Sincerely,
Richard J. Cowan
Richard J. Cowan

Response to Comment Letter 8

8-1

The decision which will be published in the Rangeland Program Summary will include only the range improvement grazing systems and allocations analyzed in the EIS. Site specific planning, however, may suggest grazing management practices which were not analyzed in the EIS. After further environmental analysis, additional practices may be included.

Site specific planning, incorporated into the Rangeland Program Summary, or following it, may dictate use of grazing management practices which were not analyzed in the EIS. If such practices more effectively or efficiently address the resource objectives for an allotment, they may be adopted. However, any changes which were not analyzed in the EIS would be subject to environmental analysis.

W.H.O.A!

WILD HORSE ORGANIZED ASSISTANCE
INC.
A Foundation for the Welfare of
Wild Free-Ranging Horses and Burros

BOARD OF TRUSTEES
DAVID R. BELDING
JACK McELWEE
GORDON W. HARRIS
BELTON P. MOURAS
GERTRUDE BRONN, Honorary
In Memoriam
LOUISE C. HARRISON
VELMA B. JOHNSTON, "Wild Horse Annie"

Kathryn Cushman
Box 26
Canterbury, New Hampshire 03224
July 27, 1982

P. O. Box 535
Reno, Nevada 89504
Telephone 323-5904
Area Code 702

William G. Leavell
Oregon State Director
Bureau of Land Management,
P.O. Box 2965
Portland, Oregon 97208

Dear Mr. Leavell:

Thank you for the opportunity to comment on the Riley Grazing Management Draft Environmental Impact Statement.

9-1

The Riley Gillets proposes a 50% reduction of the wild horse herd. At the same time an initial 27% increase in allocation to livestock is allowed. I fail to see the justification for either decision. How does a 27% increase in allocation to livestock maintain or improve public land resources?

9-2

The proposed action calls for 50% removal of horses to improve forage production yet the horses receive no share in the increased forage in future years. Forage allocations for horses are being limited simply because each AUM for a horse must be subtracted from livestock AUMs. Drastically reducing horses in order to make room for livestock does not comply with the mandate that wild horses and burros "shall be considered comparably with other resource values...including allocation of appropriate portions of the available forage." (43 CFR, 4700.0-6) Wild horses should not pay the price for what amounts to overgrazing by livestock.

9-3

W.H.O.A. has never advocated "horse only" areas (Alternative 3, p. 1-5). We only request a fair allocation of forage for wild horses and burros. We also ask for justification of the decision to remove 50% of the wild horses, just as any responsible permittee would if he were faced with reductions.

9-4

How many wild burros are included with the wild horses for the purpose of allocation? (p. 1-9, Vegetation allocation) It is irresponsible to lump the two together as forage requirements are different. We have never seen it attempted before. Page 3-17 still gives no burros numbers which appears somewhat suspicious.



Forage consumption under all alternatives except alternative 3 (Emphasize non-livestock use) exceeds 1980 forage consumption and all except 3 propose to reduce horses by 50% or more. Long term allocation of increased forage benefits only livestock. All life and wild horses are again not being considered comparably. The Riley Gillets is designed to benefit private interests rather than to fairly and effectively manage public rangeland. When, if ever, will livestock be reduced?

9-5

Why was there no wild horse specialist participating in the drafting of the Riley Gillets? Range conservationist-soils specialist does not qualify one as a wild horse specialist.

9-6

Land in the horse use areas is mainly in the good to fair category. With the present horse population of 532 there is one horse per 2000 acres while there is one animal per 166 acres for livestock. Why is livestock grazing considered helpful when apparently horse grazing is not? Livestock density is much greater than horse density. Horses travel greater distances than livestock thus providing better dispersal over the area. Livestock would do more damage to riparian areas as they tend to mill around, going into and fouling the water. Horses, on the other hand, drink and then leave, seldom if ever going into the water.

9-7

It is apparent that vegetative data is insufficient to justify removal of livestock. Thus vegetative data is also insufficient to justify removal of wild horses (and burros?). To clarify the situation W.H.O.A. would like the following information found lacking the the Riley Gillets: (1) name areas in the district where wild horses are injuring range vegetation; (2) the method used to separate wild horse use areas from wild-life and livestock use areas; (3) full resource data to justify the determination and length of time over which data was collected; (4) why is BLM going to monitor domestic livestock use over a period of years before adjusting numbers and not planning to do the same for wild horses; (5) is better data required for making livestock adjustments than for making wild horse adjustments; (6) who states, if anyone, that the wild horses are overgrazing an area?

9-8

W.H.O.A. must insist that horse numbers remain at present levels (532 horses on 1,061,140 acres) until such time that BLM can provide site specific data justifying a true need for removal of both horses and livestock.

Sincerely,

Kathryn Cushman
Kathryn Cushman
Wild Horse Organized Assistance



United States Department of the Interior

FISH AND WILDLIFE SERVICE
 Division of Ecological Services
 Portland Field Office
 727 N. E. 24th Avenue
 Portland, Oregon 97232

Reference: ES

August 4, 1982

MEMORANDUM

To : State Director, Bureau of Land Management, Portland, OR

From : Field Supervisor, Ecological Services, Portland, OR

Subject: Review of Draft Environmental Statement for Riley Grazing Management (EC 82/15)

We have reviewed the subject draft and have the following comments for use in preparing the final environmental impact statement.

General Comments

We support those objectives included under the proposed action which will benefit the diversity of fish and wildlife habitat, and those objectives which will protect water quality.

There are many riparian areas in eastern Oregon which are badly deteriorated and have little value for wildlife or fish, and we are pleased that riparian habitat will receive increased emphasis in the Riley Management Area. Riparian habitats are listed in various sections of the draft in stream miles and in acres, but nowhere are they listed to show exactly how many stream miles will be excluded from cattle grazing for the proposed action or the various alternatives.

The lack of baseline data on wildlife populations is a serious omission. Although the number of mule deer wintering on public lands is given, population estimates are not given for other species. If population information is not known, the predicted impacts of the proposed action and various alternatives cannot be made with any confidence. Or, more to the point, what good is it to know that pronghorn habitat will improve, decline, or remain the same if no information is provided on the pronghorn population. Of course, it would be rare to have current data on the populations of most wildlife species, but even updated information is better than none at all.

Response to Comment Letter 9

- 9-1 See response to comment 4-3.
- 9-2 The proposed increase in initial livestock allocation is based on the determination of livestock forage production which is defined as "The proportion of total annual vegetation production which is consumable by livestock on a sustainable basis." The proposed allocations would allow the maintenance of current forage conditions and livestock forage production.
- 9-3 See response to comment 4-1 and 4-3.
- 9-4 Allocation for 30 burros is included in the wild horse allocation. The burros were allocated AUMs at the same level as horses (12 AUMs per animal per year), which is actually more forage than they require, since burros are smaller than horses. There are no plans to gather burros.
- 9-5 If, at some future time, forage production was to decrease to the point where consumption of forage was in excess of forage production, livestock (and/or other consumptive uses) would be reduced. This would be determined through monitoring (draft EIS, page 1-13).
- 9-6 The wild horse portions of the EIS are based on planning documents prepared by the district wild horse specialist. In addition, the EIS, including the conclusions addressing impacts to horses, was reviewed by wild horse specialists at the district office, state office and Washington office levels.
- 9-7 No statement was made that horse grazing was adverse. However, timing of livestock grazing can be controlled while horses graze year long.
- 9-8 The mapping of wild horse concentration areas is based on population counts and frequent observation by district personnel during the period 1971 to 1981. Resource conditions and conflicts discussed in the and other values within the herd management areas are discussed in the Palomino Buttes and Warm Springs Herd Management Plans. No justification of horse removal is contained in the EIS because the purpose of the Riley Grazing Management EIS is to analyze the impacts of the proposed allocations of forage on all resources, including horses and vegetation. Wild horse adjustments are accomplished under the provisions of the appropriate herd management plans and are not proposed under any of the alternatives in the EIS. See responses to comments 4-1, 4-2 and 4-3.

10-1

10-2

Specific Comments

Page 1-1, Proposed Action. The DEIS states that livestock would be temporarily excluded along three stream riparian areas until resource objectives of the areas are met. Grazing would then resume in these three areas under restrictive management which would maintain the condition of the exclusion areas at the new level. What are the resource objectives for these areas? Would there be benefits to fish and wildlife habitats?

10-3

Page 1-2, Table 1-1. The figures shown under Alternative 3 Emphasize Non-Livestock, indicate that the main benefits of this alternative are to wild horses rather than other resources. This alternative should realistically be called "Emphasize Wild Horses."

10-4

Page 1-5, Alternative 3-Emphasize Non-Livestock Values. It would be helpful to show how many stream miles will be affected by the livestock exclusions, and which streams are involved.

10-5

Page 1-6, Table 1-3. Baseline data should be provided on current population levels. How is it possible to predict an increase in deer populations of +5-20 percent if no information is provided on current population levels?

10-6

Page 2-1, Table 2-2. This table presents valuable forage conditions in tabular form. It would be helpful to see where these various rankings of forage conditions occur in the EIS area. A map showing this should be added. An ideal map would be to combine this information with the current map in Figure 2-1, Vegetation Types.

10-7

Page 2-2, Paragraph 2. It would be useful to show the location of the stream and pond riparian areas on a map.

10-8

Page 2-5, Wildlife, Paragraph 2. Bald eagle roost sites are suspected in the area. Contact Malheur National Wildlife Refuge for the locations of these areas.

10-9

Page 2-7, Mule Deer, Paragraph 1. The DEIS states that in 1980 mule deer populations were about 15 percent below Oregon Department of Fish and Wildlife (ODFW) objective levels for the EIS area. What are the population levels desired by ODFW, and what are the current population levels in the EIS area?

10-10

Page 2-7, Pronghorn Antelope. What are the population objectives of ODFW, and what are the current population levels of pronghorn? How will the proposed action and the alternatives affect the ODFW objectives for pronghorn?

10-11

10-12

Page 3-10, Wildlife Habitat in Riparian Areas, Paragraph 1. We agree that exposed streambanks lead to increased sedimentation during flooding and lowered water tables. There is a great deal of evidence that the loss of streambank vegetation due to cattle grazing does serious harm to fish and wildlife habitats. Improvements in riparian zones on BLM-administered lands would benefit fish and wildlife and would lead to increased streamflows and less sedimentation, thereby benefitting fish and wildlife habitats on Malheur National Wildlife Refuge.

Page 3-13, Paragraph 1. The EIS states "Poor or fair fish habitat on BLM-administered lands is primarily due to high sediment loads, low flows, and poor riparian vegetation." We would add that all of these conditions are likely the result of overgrazing by cattle.

Page 3-13, Water Associated Birds. Livestock grazing is not all bad in play areas. In some cases, it can provide browse areas for migrating birds.

Page 3-16, Table 3-15. The total number and biomass of the small animals shown in this table affect all predators above them in the food chain. If populations are reduced, as shown under the proposed action, all prey species will eventually be reduced as well. We are particularly concerned about raptor species which are dependent upon habitats within the EIS area.

Russell D. Peterson
Russell D. Peterson
Field Supervisor

10-12 BLM administers 35.7 miles of streams and 387 acres of riparian vegetation located mostly on small tributaries of the Silves River and Silver Creek drainages. The water in both of these drainages is used extensively for irrigation of agricultural crops before it reaches the Malheur National Wildlife Refuge. Such BLM-administered streams represent such an insignificant amount of these drainages, changes in the riparian vegetation along those stream segments would have no impact on fish and wildlife habitat on the refuge.

- Response to Comment Letter 10
- 10-1 See response to comment 6-4.
- 10-2 The BLM is primarily responsible for managing wildlife habitat. Habitat trend can be predicted without knowing baseline population levels. The decisionmaker needs to know how the various alternatives will affect the habitat of an economically important species such as antelope. Population data for antelope appears in Table 2-4 in the draft EIS. See response to comment 7-2.
- 10-3 The primary resource objective in these areas is to increase the amount of woody riparian vegetation. The result of the increase would improve the wildlife habitat condition rating to good. Grazing would not be resumed in these areas until the good rating is achieved. Expected benefits to fish and wildlife habitat are discussed on pages 3-10, 3-13 and 3-15 of the draft EIS.
- 10-4 Tables 3-1, 3-3, 3-6 and 3-9 of the draft EIS show the beneficial impacts of Alternative 3 to vegetation, streambank stability, wildlife habitat at streamside riparian areas and fish habitat.
- 10-5 See response to comment 6-4.
- 10-6 Baseline data for mule deer is found in Table 2-6 of the draft EIS. Deer increases are predicted because of improved habitat due to grazing systems and water developments. See pages 3-14, 3-15 and table 3-12 of the draft EIS.
- 10-7 Appendix B, Table B-2, tabularizes forage condition for each allotment. This table was used as a basis for predicted change in forage condition.
- 10-8 See Figure 2-1 of the draft EIS for location of stream and pond riparian areas. All riparian areas are listed in Table 3-5.
- 10-9 No impacts from the Bureau's grazing management program are anticipated on any of the known or suspected bald eagle roost sites. The Burns District is coordinating with Oregon Department of Fish and Wildlife, Fish and Wildlife Service and the Forest Service with respect to bald eagle roost sites in the area.
- 10-10 Deer populations are shown in Table 2-4. Management objective levels for deer have been determined by Oregon Department of Fish and Wildlife for Herd Management Units (ODFW 1981a, 1981b). Using this data, the management objective numbers for wintering deer were calculated at about 10,650 for the Riley EIS area.
- 10-11 Oregon Department of Fish and Wildlife has not determined management objective numbers for antelope. Current populations are listed in Table 2-4 and impacts to populations are stated on page 3-17 of the draft EIS.



United States Department of the Interior

NATIONAL PARK SERVICE

Pacific Northwest Region
Westin Building, Room 1920
2001 Sixth Avenue
Seattle, Washington 98121

1202-03 (PNR-RE)
Riley Grazing Management EIS

July 30, 1982

IN REPLY REFER TO:

11

23

Riley, Oregon
Aug. 3, 1982

12

Oregon State Director (935)
Bureau of Land Management
P.O. Box 2965
Portland, Oregon 97208

Dear Sir,

I have been a permitte in this area for the past 32 years. The fences that have been put in to help with livestock management has helped to improve the feed by distributing the cattle over a wider area.

We need more water in all the pastures. More brush control by spraying or fire will help provide more feed for cattle and wildlife. We do not need many more fences.

In pasture #7010 "Claw Creek the proposed action is 7 miles of fence, and to fence off most of the live water. This leaves no water for cattle. 7 miles of fence is not necessary in this alotment for better management.

In pasture #7012 "Pack Saddle" brush control is necessary to preserve a. Seeding.

In pasture #7015 "Second Flat" the proposed action is to cross fence and make a 2 pasture rotation system. This alotment has been improving for the last 5 years after the removal of 30 plus head of horses.

12-1

Memorandum

To: State Director, Bureau of Land Management, Portland, Oregon
From: Acting Associate Regional Director, Recreation Resources and Professional Services, Pacific Northwest Region
Subject: Review of Draft Environmental Impact Statement for Riley Grazing Management Program

The proposed action consists of range improvements, vegetation allocation, and implementation of grazing management; and the purpose of the action is to implement planning decisions needed for management protection and enhancement of the rangeland resources.

It has been determined that these actions will have either no impacts or insignificant impacts upon recreation or cultural resources.

Thank you for the opportunity to comment.

Frederick J. Bender

Frederick J. Bender

This pasture is extremely rocky but cattle use it well the way it is. I would like to fence the NW corner to gather in when we move out in June. This would also help to improve the grass in this area, about 400A.

Pasture #7016 "Juniper Ridge" could have more brush control. This could take care of any possibility of over grazing of the Claw Creek allotment and still not inconvenience the permittee that runs in both allotments. There are 2 good wells in this pasture that could be piped, and a fence could divide the pasture very easy. I think some of these alternatives should be looked at.

12-2

Section on Silver Creek should not be eliminated from livestock grazing. This section has been used as a holding field for the past 40 or more years.

Permittees on the ~~45~~ US.F.S. have held cattle in this pasture for 1-2 days going to the forest and gathered their cattle in here in the fall and held them for 1-2 weeks. If they own no land next to the forest they may have no place to go with their cattle each day. Some base property is 20 miles from the forest.

12-3

Response to Comment Letter 12

12-1 Water will be made available for livestock by means of water gaps or alternate sources of water.

12-2 See response to comment 8-1.

12-3 Livestock grazing is not authorized in the area. Allotment-specific planning will address management alternatives to using this area as holding pasture.

George McGee

George McGee

Text Revisions

Page 1-2, Table 1-1, Range Improvements. Change reservoirs to 43 and water-holes to 23 for proposed action.

Page 1-12, Deferred Rotation Grazing. Change the abbreviation DRR to DR2.

Page 1-13, First column, last paragraph. Delete the word "most".

Page 1-15, Goal 6. Change first sentence in Discussion to read: Water quality would be maintained and/or improved under the proposed action and all alternatives.

Page 3-1, Second column, third paragraph. Change first sentence to read: Vegetation is the only resource which would have significant primary impacts.

Page 3-15, First column, first paragraph. Change last sentence to read: Rest rotation grazing would greatly increase bitterbrush availability for deer.

Page 3-17, Table 3-16. Change AUMs total use under the No Action Alternative to 720 for Palomino Buttes and 2,400 for Warm Springs.

List of Preparers. Add to related professional experience for William Gilmore: 5 years, BLM (Range Conservationist).

Appendix B, Table B-2. Replace with the following Table B-2:

Appendix B, Table B-3. Replace totals for proposed action with 8 spring developments, 62 miles pipeline, 5 wells, 43 reservoirs and 23 water-holes. Replace total for Alternative 3, brush control/seed, with 23,462 acres. All other totals are unchanged.

Appendix C. Change equation for derivation of wildlife AUMs to the following:

$$\begin{array}{ccccccc} \text{Deer} & \text{Months} & 1 & \text{AUM} & & \% \text{ Dietary} & \text{Deer} \\ \text{x} & \text{of} & \text{x} & \frac{\quad}{5.3} & \text{x} & \% \text{ BLM} & \text{x} & = & \text{Deer} \\ \text{Nos.} & \text{Use} & & & & \text{Overlap} & & & \text{AUM} \\ & & & & & & & & \text{Allocation} \end{array}$$

References Cited: Delete Oregon Department of Environmental Quality (1976b). Change ODEQ (1976a), Goose and Summer Lakes Basin to Malheur Lake Basin.

26 Appendix B, Table B-2

Existing Forage Condition, Grazing Systems and Period of Use

Allot #	Pasture # and Name	BLM Acres	Existing Forage Condition				P.A.	Grazing System ¹			Maximum Period of Use			
			Good	Fair	Poor	Unknown		Alt. 1 ²	Alt. 2	Alt. 3	Existing	Proposed		
7015	01 FFR	640	640	0	0	0	FRF	FRF	FRF	FRF	401	615	401	1031
	02 NATIVE RANGE	7,641	4,954	2,687	0	0	RR2	SS	RR2	DR2	401	615	401	615
7016	01 JUNIPER RIDGE	19,858	0	19,858	0	0	DR2	SS	DR2	DR2	401	930	401	930
	02 SPRAY	1,910	0	1,910	0	0	DR2	SS	DR2	DR2	401	930	401	930
7017	01 NORTH	1,855	0	1,855	0	0	FRF	FRF	FRF	FRF	325	730	325	730
	02 SEEDING	480	0	480	0	0	FRF	FRF	FRF	FRF	325	730	325	730
	03 RANCH FIELD	1,327	0	1,327	0	0	FRF	FRF	FRF	FRF	325	730	325	730
	04 SOUTH	5,364	0	2,976	2,388	0	EA	SS	EA	EA	325	730	301	430
7018	01 MOON	3,135	3,135	0	0	0	DF	DF	DF	DF	701	831	701	831
	02 DUSENBERRY	1,771	1,771	0	0	0	DR1	RR3	DR1	DR1	401	630	401	630
	03 COYOTE RIM	8,067	0	0	8,067	0	DR1	RR2	DR1	DR1	401	630	401	1031
	04 SILVER LAKE	3,313	0	3,313	0	0	DF	DF	DF	DF	901	1031	901	1031
7019	01 LONE RABBIT	2,435	2,435	0	0	0	DR1	RR3	DR1	DR1	401	930	401	1031
	02 GRASSY BUTTE													
	SEEDING	15,261	0	2,580	12,681	0	DR1	DR1	DR1	EX	401	930	401	1031
	03 PALOMINO BUTTES	29,588	19,633	9,955	0	0	DR1	DR1	DR1	EX	401	930	401	1031
	04 W. CHAIN LAKE	122	0	122	0	0	DR1	DR1	DR1	EX	401	930	401	1031
7020	01 NATIVE RANGE	10,168	0	10,168	0	0	DR2	SS	DR2	DR2	415	930	401	1031
	02 SEEDING	4,480	0	4,480	0	0	DR1	SS	DR1	DR1	415	930	401	1031
7021	01 WEAVER LAKE	22,393	0	22,393	0	0	RR3	RR3	RR3	EX	401	930	401	1031
	02 EAST CHAIN EX	250	0	250	0	0	EX	RR3	RR3	EX	401	930	401	1031
7022	01 DOG MTN	5,120	0	5,120	0	0	RR2	SS	RR2	RR2	501	815	501	815
7023	01 WEST	6,457	2,157	4,300	0	0	DR2	DR2	DR2	DR2	401	1031	401	1031
	02 EAST	6,044	2,560	3,484	0	0	DR2	DR2	DR2	DR2	401	1031	401	1031
7024	01 WILLOW FLAT	170	0	170	0	0	FRF	FRF	FRF	FRF	401	1031	401	1031
	02 SAGEHEN	10,617	1,944	7,009	1,664	0	DR2	DR2	DR2	DR2	401	1031	401	1031
7024	03 WILLOW CREEK	11,502	1,114	9,551	837	0	DR2	DR2	DR2	DR2	401	1031	401	1031
	04 HARDING FIELD	162	0	162	0	0	FRF	FRF	FRF	FRF	401	1031	401	1031
7025	01 GOULDIN	4,051	0	4,051	0	0	RR2	SS	RR2	RR2	416	1015	401	831
	02 RADAR HILL EX	40	0	40	0	0	EX	SS	EX	EX	416	1015	NO	USE
7026	01 HORTON MILL	575	575	0	0	0	RR1	RR1	RR1	RR1	416	831	416	831
	02 SHOEFFER RES	1,115	0	1,115	0	0	RR1	RR1	RR1	RR1	416	831	416	831
	03 APPLING-WALTER	1,190	0	1,190	0	0	RR1	RR1	RR1	RR1	416	831	416	831
7027	01 SOUTH	45	45	0	0	0	FRF	FRF	FRF	FRF	401	1031	401	1031
	02 NORTH	150	150	0	0	0	FRF	FRF	FRF	FRF	401	1031	401	1031
	03 W. EMIGRANT													
	CR EX	30	1	29	0	0	FRF	FRF	FRF	EX	401	1031	401	1031
7028	01 STINGER CREEK	50	50	0	0	0	FRF	FRF	FRF	FRF	401	1031	401	1031
7029	01 CRICKET-EMIGRANT	1,509	1,509	0	0	0	FRF	FRF	FRF	FRF	401	1031	401	1031
7030	01 WILLOW FLAT	753	0	753	0	0	FRF	FRF	FRF	FRF	401	1031	401	1031
	02 EARLY TURNOUT	5,685	0	5,685	0	0	EA	EA	EA	EA	421	430	421	430
	03 BOONE CNYN	20	0	20	0	0	FRF	FRF	FRF	FRF	401	1031	401	1031
	04 LAKE CREEK	9,365	0	9,365	0	0	DR2	DR2	DR2	DR2	501	1011	505	1011
	05 BASSOUT CABIN	180	0	180	0	0	FRF	FRF	FRF	FRF	401	1031	401	1031
	06 CAMPBELL PLACE	200	0	200	0	0	FRF	FRF	FRF	FRF	401	1031	401	1031
	07 BOULDER SPRING	10,237	0	10,237	0	0	DR2	DR2	DR2	DR2	505	1011	505	1011
	08 BASSOUT FIELD	155	0	155	0	0	FRF	FRF	FRF	FRF	401	1031	401	1031
	09 GREENSPOT EX	10	0	5	5	0	EX	DR2	EA	EX	505	1011	421	430
	10 STATE RES EX	15	0	10	5	0	EX	DR2	DR2	EX	505	1011	505	1011
	11 SKULL CR EX	200	178	22	0	0	DR2	DR2	DR2	EX	505	1011	505	1011
	12 WILLOW RES EX	40	0	28	0	12	DR2	DR2	DR2	EX	505	1011	505	1011
7031	01 WEST TABLE	2,055	2,055	0	0	0	DR1	DR1	DR1	DR1	601	930	601	930
	02 EAST TABLE	3,334	3,334	0	0	0	SS	SS	SS	SS	601	930	601	930
	03 HAY CREEK RANCH	230	230	0	0	0	FRF	FRF	FRF	FRF	501	531	401	1031
	04 HAY CREEK EX	70	0	70	0	0	EX	FRF	FRF	EX	601	930	601	930
	05 E. EMIGRANT CR EX	65	0	65	0	0	DR1	DR1	DR1	EX	601	930	601	930
7032	01 HOTCHKISS	375	0	375	0	0	FRF	FRF	FRF	FRF	401	1031	401	1031
	02 L. SKULL CR EX	40	38	2	0	0	FRF	FRF	FRF	EX	401	1031	401	1031
7033	01 PLATEAU	572	572	0	0	0	DF	DF	DF	DF	716	1130	716	1130
	02 FEDERAL	245	0	245	0	0	DR2	DR2	DR2	EX	401	1130	401	1130
	03 RIVER	102	102	0	0	0	DR2	DR2	DR2	DR2	401	1130	401	1130
	04 MEADOW	120	120	0	0	0	DF	DF	DF	DF	1001	228	1001	228
	05 BAKER RANCH	5	5	0	0	0	FRF	FRF	FRF	FRF	401	1130	401	1130
7034	01 SCAT FIELD	837	837	0	0	0	FRF	FRF	FRF	FRF	401	1130	401	1031
7035	01 SILVIES MDW	1,356	1,356	0	0	0	DF	DF	DF	DF	701	1031	701	1031
7036	01 HAYES	5,490	5,490	0	0	0	DR1	SS	DR1	DR1	401	715	401	715
	02 CUSTODIAL	20	20	0	0	0	FRF	FRF	FRF	FRF	401	1031	401	1031
7037	01 COAL PIT SPRINGS	2,895	2,895	0	0	0	RR1	RR1	RR1	RR1	501	831	501	831
7038	01 CURRY GORDON	729	0	729	0	0	FRF	FRF	FRF	FRF	401	1031	401	1031
7039	01 CAVE GULCH	2,004	2,004	0	0	0	DR1	RR2	DR1	DR1	501	731	401	930
7040	01 LANDING CREEK	3,114	0	3,114	0	0	RR2	RR2	RR2	RR2	401	531	401	531
	02 LANDING CREEK EX	500	500	0	0	0	RR2	RR2	RR2	EX	401	531	401	531
7041	01 RED LICK	2,391	2,391	0	0	0	RR1	RR1	RR1	RR1	601	930	601	930
	02 STANDARD													
	PARALLEL	469	469	0	0	0	RR1	RR1	RR1	RR1	601	930	601	930
	03 WEIGAND	1,234	1,234	0	0	0	SS	SS	SS	SS	601	630	601	630
	04 L. LANDING CR EX	200	200	0	0	0	SS	SS	SS	EX	601	630	601	630
7042	01 DOLE SMITH	445	445	0	0	0	RR1	DR1	RR1	RR1	401	930	401	930
7043	01 WEST MOSQUITO	925	925	0	0	0	RR3	RR3	RR3	RR3	516	531	516	531
	02 EAST MOSQUITO	1,030	1,030	0	0	0	RR3	RR3	RR3	RR3	516	531	516	531
	03 MAHOGANY RIDGE	245	0	245	0	0	EA	EA	EA	EA	515	519	515	519
	04 MUD SPRING	6,346	0	6,346	0	0	RR3	RR3	RR3	RR3	401	515	401	515
	05 GRAVEL RIDGE	6,585	0	6,585	0	0	RR3	RR3	RR3	RR3	401	515	401	515
7044	01 COWING	260	260	0	0	0	FRF	FRF	FRF	FRF	401	1031	401	1031
7045	01 WHITING	399	399	0	0	0	FRF	FRF	FRF	FRF	401	1031	401	1031
7046	01 BAKER HILL FIELD	188	188	0	0	0	FRF	FRF	FRF	FRF	401	1031	401	1031
7047	01 PEABODY	268	268	0	0	0	FRF	FRF	FRF	FRF	401	1031	401	1031
7048	01 VARIEN CNYN	317	0	317	0	0	FRF	FRF	FRF	FRF	401	1031	401	1031
7049	01 FORKS OF POISON CR	2,879	0	2,879	0	0	RR1	RR1	RR1	RR1	416	930	416	930
7050	01 CLEMENS	466	466	0	0	0	FRF	FRF	FRF	FRF	401	1031	401	1031
7														

Appendix B, Table B-2

Existing Forage Condition, Grazing Systems and Period of Use

Allot #	Pasture # and Name	BLM Acres	Existing Forage Condition				P.A.	Grazing System ¹			Maximum Period of Use			
			Good	Fair	Poor	Unknown		Alt. 1 ²	Alt. 2	Alt. 3	Existing	Proposed		
7001	01 WEED LAKE	269	0	269	0	0	FFR	FFR	FFR	FFR	401	1031	401	1031
	02 JACK CREEK	160	0	160	0	0	RR3	RR3	RR3	FFR	401	831	401	831
	03 MAT DAVIES	480	480	0	0	0	FFR	FFR	FFR	FFR	401	1031	401	1031
	04 REFUGE FIELD	100	100	0	0	0	FFR	FFR	FFR	FFR	401	1031	401	1031
	05 JACK MTN	160	160	0	0	0	FFR	FFR	FFR	FFR	401	1031	401	1031
	06 NARROWS FIELD	25	0	25	0	0	FFR	FFR	FFR	FFR	401	1031	401	1031
	07 JACK MTN EAST	8,041	8,041	0	0	0	RR3	RR3	RR3	EX	401	831	715	331
	08 EAGLES NEST NORTH	4,285	3,285	0	1,000	0	DR1	RR2	DR1	DR1	401	831	401	831
	09 EAGLES NEST MID	3,945	3,945	0	0	0	DR1	RR2	DR1	DR1	401	831	401	831
	10 EAGLES NEST SOUTH	6,015	4,192	0	1,823	0	DR1	RR2	DR1	DR1	401	831	401	831
	11 SODHOUSE FIELDS	3,086	0	3,086	0	0	DF	RR2	DF	DF	401	831	715	331
	12 THE NARROWS	55	0	55	0	0	FFR	FFR	FFR	FFR	401	1031	401	1031
	13 NATIVE	143,769	66,325	34,294	43,150	0	RR3	RR3	RR3	EX	401	831	410	831
	14 BIG FOOT RES EX	15	5	6	0	4	EX	EX	RR3	EX	410	831	410	831
	15 FOSTER LAKE EX	3,700	0	3,700	0	0	RR3	RR3	RR3	EX	401	831	410	831
	16 S NARROWS EX	160	0	160	0	0	EX	EX	EX	EX	NO	USE	NO	USE
7002	01 BIG STICK SEEDING	430	430	0	0	0	RR3	SS	DR1	RR3	401	915	401	915
	02 MOON	100	100	0	0	0	FFR	FFR	FFR	FFR	401	915	401	1031
	03 HURLBERT SEEDING	405	405	0	0	0	RR3	SS	DR1	RR3	401	915	401	915
	04 HORSEHEAD SEEDING	2,225	2,225	0	0	0	RR3	SS	DR1	RR3	401	915	401	915
	05 W WARM SPRINGS	278,969	43,371	158,111	77,487	0	RR3	SS	DR1	EX	401	915	401	930
	06 LAKE ON TRAIL EX	320	0	0	320	0	EX	SS	DR1	EX	401	915	401	915
	07 SEILOFF DIKES EX	60	0	60	0	0	EX	EX	EX	EX	NO	USE	NO	USE
	08 BUZZARD SPRING EX	80	0	0	80	0	EX	SS	DR1	EX	401	915	401	915
	01 PETERSON PLACE	322	0	322	0	0	FFR	FFR	FFR	FFR	401	1031	401	1031
	02 WAGONTIRE MTN	8,456	4,060	4,396	0	0	FFR	FFR	FFR	FFR	401	1031	401	1031
	03 SOURDOUGH SEEDING	16,493	10,677	5,816	0	0	DR1	DF	DR1	DR1	716	925	401	1031
	04 HORSEHEAD SEEDING	1,280	1,280	0	0	0	DR1	SS	DR1	DR1	401	1031	401	1031
	05 LITTLE SEEDING	2,554	2,554	0	0	0	DR1	DF	DR1	DR1	716	925	401	1031
	06 BIG SEEDING	6,029	6,029	0	0	0	DR1	DF	DR1	DR1	716	925	401	1031
	07 HAY LAKE SEEDING	2,206	0	0	2,206	0	DR1	RR1	DR1	DR1	401	925	401	1031
	08 EAST WAGONTIRE SOUTH	50,650	0	1,182	49,468	0	DR1	RR1	DR1	DR1	401	925	401	1031
7004	01 WAGONTIRE OLD ANDERL PLACE	70,059	6,527	52,602	10,930	0	DR2	RR1	DR2	DR2	401	925	401	1031
	02 SHEEP MTN SEED.	80	0	80	0	0	FFR	FFR	FFR	FFR	401	1031	401	1031
	03 S W WAGONTIRE	9,190	4,598	4,592	0	0	RR1	SS	RR1	RR1	401	1031	401	1031
	04 N W WAGONTIRE	41,240	10,215	18,022	13,003	0	DR2	SS	DR2	DR2	401	1031	401	1031
	01 GLASS BUTTE	16,206	5,115	9,011	2,080	0	RR1	SS	RR1	RR1	401	1031	401	1031
	01 RIMROCK LAKE	6,973	0	6,973	0	0	DR2	SS	DR2	DR2	401	1031	401	1031
	02 RIMROCK LAKE EX	20,900	0	20,900	0	0	DR2	SS	DR2	DR2	401	1015	401	1015
	01 UPPER	135	0	40	95	0	DR2	SS	DR2	EX	401	1015	401	1015
	02 LOWER	8,378	0	8,378	0	0	DR2	DR2	DR2	DR2	416	1031	416	1031
	03 GAP FIELD	8,870	0	8,870	0	0	DR2	DR2	DR2	DR2	416	1031	416	1031
	04 CLARK FIELD	860	0	860	0	0	EA	EA	EA	EA	401	416	401	416
	01 STATE FIELD	105	0	105	0	0	FFR	FFR	FFR	FFR	401	1031	401	1031
	02 UPPER	400	0	400	0	0	FFR	FFR	FFR	FFR	401	1031	401	1031
	03 LOWER	4,530	0	4,530	0	0	DR2	DR2	DR2	DR2	430	930	430	930
	04 SHIELDS	6,111	0	6,111	0	0	DR2	DR2	DR2	DR2	401	930	401	930
	05 CECIL LAKE EX	1,521	1,521	0	0	0	RR2	RR2	RR2	RR2	416	531	416	531
06 NORDELL LAKE EX	185	0	70	115	0	DR2	DR2	DR2	EX	430	930	430	930	
07 SHEEP LAKE EX	190	0	80	110	0	DR2	DR2	DR2	EX	430	930	430	930	
7009	01 DRY LAKE	160	0	30	130	0	DR2	DR2	DR2	EX	401	930	401	930
	02 DRY LAKE EX	18,039	0	18,039	0	0	SS	DR2	DR2	DR2	401	1031	401	1031
	03 SILVER/NICOLL CR EX	140	0	140	0	0	SS	DR2	DR2	EX	401	1031	401	1031
7010	01 CLAW CREEK	335	335	0	0	0	SS	DR2	DR2	EX	401	1031	401	1031
	02 EGYPT CREEK	23,255	4,977	18,045	233	0	SS	DR2	DR2	DR2	401	930	401	1031
	03 CLARK FIELD	42	0	42	0	0	FFR	FFR	FFR	FFR	401	930	401	1031
	04 ROUGH/SILVER CR EX	60	0	60	0	0	FFR	FFR	FFR	FFR	401	930	401	1031
	05 UPPER CLAW CR EX	362	320	42	0	0	SS	TEX	DR2	EX	401	930	401	1031
	06 DAIRY CR EX	130	0	130	0	0	SS	TEX	DR2	EX	401	930	401	1031
	07 SILVER CR EX	118	110	8	0	0	SS	DR2	DR2	EX	401	930	401	1031
	08 LOWER CLAW CR EX	247	247	0	0	0	SS	DR2	DR2	EX	401	930	401	1031
7011	01 UPPER VALLEY SAWMILL/SILVER CR EX	30	0	30	0	0	SS	DR2	DR2	EX	401	930	401	1031
	02 LOWER CLAW CR EX	1,275	0	1,275	0	0	FFR	FFR	FFR	FFR	416	831	401	1031
	03 LOWER CLAW CR EX	440	0	440	0	0	FFR	FFR	FFR	EX	416	831	401	1031
7012	01 SECTION 8	30	0	30	0	0	FFR	FFR	FFR	EX	416	831	401	1031
	02 W WICKIUP	623	623	0	0	0	EX	EX	DR1	EX	NO	USE	616	815
	03 WICKIUP CR	820	820	0	0	0	DR1	DR1	DR1	DR1	616	815	616	815
	04 E WICKIUP	224	224	0	0	0	TEX	TEX	TEX	EX	NO	USE	NO	USE
7013	01 NORTH	1,324	1,324	0	0	0	DR1	DR1	DR1	DR1	616	815	616	815
	02 SOUTH	960	960	0	0	0	SS	RR3	RR3	RR3	501	930	501	930
7014	01 MILLER CNYN SEEDING	1,280	1,280	0	0	0	SS	RR3	RR3	RR3	501	930	501	930
	02 NATIVE RANGE	445	445	0	0	0	DR1	EA	EA	EA	401	1015	401	430
		10,598	9,460	0	1,138	0	DR1	RR2	RR2	RR2	401	1015	401	630

Form 1279-3
(June 1984)

BORROWER

SF 85.35 .07 R54 1982

Riley grazing manager
program

DATE LOANED	BORROWER

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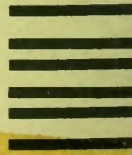
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